

Exhibit “1”

DECLARATION OF Jane Doe 1

I, Jane Doe 1, declare under criminal penalty under the law of Utah that the foregoing is true and correct:

1. I am over the age of eighteen and competent to testify to the statements herein.

2. From approximately 1983 to 1986, while I was 5-8 years old, my siblings and I were sexually assaulted on numerous occasions by my father, Perpetrator, ^{Doe 1, Male Def. & Doe 2, Female Def.}, who were in our local ward, my grandmother, LS, and a teenage babysitter, who was also in our ward. There were also other teenagers and adults involved from time to time.

3. The abuse included “touching parties”, which were gathering of adults, teenagers and children. The adults involved were primarily Perpetrator, and D1D & D2D. My teenage babysitter, who also babysat the ^{Doe Defs.} children, was named CW. When the “touching parties” first started, my younger sister, ^{Jane Doe 5,} and the daughter of D1D & D2D, who was ^{Jane Doe 5's} age, were involved. As I got older, the younger daughter of D1D & D2D became involved as did my younger siblings, ^{Jane Doe 2} and ^{John Doe 1,}. I also remember seeing BD, another young girl from the ward, at some of the parties. These parties would happen frequently; sometimes on a weekly basis, sometimes 1-2 times a month. I remember having “touching parties” on Saturday and then going to Church on Sunday and having D2D, aka “Sister D2D”, be our primary chorister and having her husband, D1D, sit up on the stand since he was in the Bishopric.

4. Typically, the “touching parties” would start with the adults telling us to “put on a show” for them. These shows were usually “dances” that me, ^{Jane Doe 5} and the oldest daughter of D1D & D2D would perform. These dances would always end with us undressing. I remember this is when the applause from the adults and our babysitter would get the loudest. After

we were naked, the adults (and teenage babysitter) would sexually assault us.

5. This included touching our private parts and penetrating us vaginally and anally with their finger and sometimes using objects like crayons or candy to penetrate us. I recall D1D being the meanest of the adults. He seemed to encourage the others to participate. There were usually treats and bribes involved at every stage of the parties. The fondling included the adults masturbating me and the other children.

6. The adults also forced me and the other children to touch and masturbate them. The adults would refer to the touching as "marriage lessons." I was forced to touch and lick D1D and Perp.'s genitals. D1D and Perp. did not always get completely naked but would expose their penises and make me touch and suck them. I was also forced to touch the bare breasts of D2D as well as my teenage babysitter, CW

7. It seemed to me that D1D was in charge of the parties and would encourage all of the kids to perform. He would also encourage involvement of the adults. At one of these parties, I saw my father Perp. having sex with our babysitter, CW. At another, I saw him having sex with our grandmother, LS.

8. These parties would take place at my house, at D1D & D2D's house, and at my grandmother's house. These parties seemed to happen nearly every time the babysitter would watch us, or when our mom was out of town or away from the house. There were times when my mom and Perp. were on a date and the parties would happen at my house with just D1D & D2D, CW and sometimes another older adult man and/or friends of CW being present.

9. When I became older, Jane Doe 2 and John Doe 1 were also present at these parties. I remember Jane Doe 2 being touched. Similar to what happened to Jane Doe 5 and me, there were times when each of these adults penetrated Jane Doe 2's vagina with their fingers. There were other times

when Jane Doe 2 was penetrated with objects.

10. When John Doe 1 was just over a year old, he became an object at these parties as well. The adults would get John Doe 1 naked and touch him. They seemed to delight in the fact that they could make John Doe 1 erect at such a young age. They would put candy on John Doe 1's erect penis and make me and the other kids lick candy off him.

11. The adults started to video tape some of the "touching parties". I recall when we were doing our "dance" and then being undressed that we were being videotaped. The videotaping would continue during the sexual assaults and rapes that I have described above.

12. There were often threats or punishments so that we wouldn't tell anyone what was happening. Some of these threats or punishments included making us drink a concoction containing urine and feces. Other times we were forced to drink coffee. After drinking the coffee, the adults proceeded to shame us for being bad since we were breaking the Word of Wisdom. They explained that since we were wicked, nobody would believe us, so we better not tell anyone.

13. Throughout the years of abuse by my dad, D1D, D2D, and others, I prayed to Heavenly Father for the hurting to stop. After we disclosed the names of our abusers, my mom kicked my dad out of the house. We then spent some time with my Belle and Boppa, my maternal grandparents, at their condo in Hawaii.

14. While I was in Hawaii, my maternal grandmother typed a poem that I wrote about the abuse I suffered at the hands of^{Perp.}, D1D & D2D .. The poem is attached as Exhibit A.

15. After returning from Hawaii, I remember being visited by Apostle Neil A. Maxwell. Elder Maxwell was a friend of my maternal grandparents. Elder Maxwell gave me and each of my younger siblings a blessing by laying his hands on my head. During that blessing he said something to the effect that the abusers had made "horrible choices". He talked about how God

would be the judge of these adult abusers and that I needed to forgive.

16. Perp. baptized me when I turned 8 years old, during the time period that he, D1D & D2D and others were doing these terrible things to me. After disclosing the abuse, I expressed a desire to be re-baptized as I believed that my original baptism was tainted and should not count because Perp. was not a worthy priesthood holder. This request for a rebaptism was granted sometime after Elder Maxwell gave me a blessing.

17. As part of my upbringing, I wrote in a journal on an almost weekly basis. In some of my entries, I wrote about the abuse I suffered. Some of the relevant pages are attached as Exhibit B.

Signed on the 22 day of August, 2018, at Derwood (city or county),
Maryland (state).

Jane Doe 1

A black rectangular redaction box covering the signature of Jane Doe 1.

Signature

Exhibit “A”

to Declaration of

Jane Doe 1

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Exhibit “A”

Exhibit “A”

Exhibit “A”

Jane Doe 1

March 1986 by 8 year

Feb. 128
Prudential-Bache
Securities

To Daddy

Daddy I hate you. Daddy I do.
You have done wicked things
And D2D has too.

You have made me suck on your penis
And took me to your awful mom's
She worse than you
You have tricked Mommie.
And lied to her too.
You took me to ^{D1D & D2D}
And I'd like to hit you.
I truly do hate you
Way worse than I would hate to eat mud.
Daddy I would like to strike you dead
But the good part of you I love more than my own head.
We're in Hawaii, I miss you so much.
We've truly had such great, great fun
And read so many stories and had so many treats
But Daddy I miss you the most when we're on the beach.

I have not gone snorkling
* With Boppa but twice
And then we fed the fish
Cakes made of rice.
I have a new swimming suit
~~Light~~ Light purple with straps
That go across my shoulders
And then down my back.
It also has a frilly skirt
Made of two white ruffles that when I play
They twirl like a dress on a holliday.

Boppa was here for a week or two
And Belle has helped me
To tell things about you.
We know that D1D & D2D, the Ws and the Ss'
Put together would not equal you and Grandma put together.
I hated those parties
They weren't any fun
Even though the treats were quite mummy and fun.
I hated the games you forced us to play
And the way that you made us
Touch your penis olay.

We've rented some movies
And popped us some corn
And watched the videos
With no note of scorn.
John Doe 1 threw his glass down
And of Belle's dishes broke
A glass full of water, and ice on her porch.
We've gone on some picnics
And played in the waves
And gone shopping for games.
On the last day that Boppa was here in Hawaii
We went shopping and Boppa ran away.

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We finally found him
With ^{John Doe 1} and an ice cream cone
And ^{John Doe 1} was all happy
And we ate the chicken to the bone.

Prudential-Bache
Securities

Public Finance
Daddy I truly miss you.
And I can't wait til we're home,
But for now I'm just writing you
This ^{Little} poem!

THE END

Jane Doe 1

by

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Exhibit “B”

to Declaration of

Jane Doe 1

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Exhibit “B”

Exhibit “B”

Exhibit “B”

great deal of the stock here, quite there was
I did a piano recital.

March 1986

Free

complaint, I

John Doe 1

D1D

CM

I feel bad
I think Shadow is pregnant again
when can more it's going to be so far to be away
from this horrible roller disgusting stinking people.

March 16, 1982

Monomy is king of total brot All the I love

you sentenced in 7th of Dec I will I could cross out.

We went and saw Mike's play. We think Shadow is

going to have kittens again and Jane Doe 2

Jane Doe 2

Jane Doe 5

Humans is being a little
bored of everything. It's
I feel... I feel... I feel...
Narrow. And we are going
with people as we go.

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PAGE NO.

kind of sad to be going to a new school where
I won't know anybody cause I know some but
Mamma's putting me in the dumb class.
We went to the cabin + had a fun time. We saw
our 2nd cousins.

R.W.

I feel sad about growing up because I have
to leave behind my toys + I start paying more
interest to friends. And so I start paying more
attention to my books. But growing up is fun
too. Cause your body start changing so you
start changing + you get smarter.

It was good we told. Even though our
prayers weren't answered the way we wanted
them to be. Because we wanted the wicked
people to just stop without us telling. And I
told the State President the articles of Faith +
he told me what they meant. He kept telling me
that I had to have faith. I felt better after
I talked to him. It was like throwing up.

Why don't you drive me out to Dr. Whitehead
whenever I'm feeling bad.

I hope Daddy will get better so that Mamma
won't get married to some body else.

I had a fun time at my party. I had a
party with my my new friends + I found out
that there is only one girl going to be in my
class maybe. Probably she'll be in the other class.

Aug 17

Hi there!!
North probably I'm going to be in the
to put me in a mix. Mommy was an annoying
prince I'll be in it but she talked to the
it is because I was I + she talked to the
also

And at Raging waters I held them especially in the wave pool.

I had an excellent apt. at Dr. Whitehead. I talked - I talked + I talked + I talked + Dr. Whitehead said if I'd talk 'till that good word really see some changes. In feelings. So our head will change color inside.

10

with change color inside.
Yeah, doesn't get to be his testimony or be that important thing any more. I + used to make me feel awful. Grandpa was scaredy cat! She has a for sale sign in front of her house + is trying to move + run away. She's scared of us! She's got an ounce of brains. It makes me feel + triumphant! One day we'll put her in our car + shove her in our wood burning stove + keep her there until the police come.

Fr. Day

Aug 24

Tamara we are going to the
I've to 2 am I had
yes Calypso. We and
her and he and I
dum bag off to be
yoon 19 19 19

DATE _____

PAGE 13

John Doe 1

John Doe 2

John Doe 1

S

A

T

It's good that they would have made
Don't you feel sorry for
He'll be raised with this - and they'll take it out
on their own kids even more since they don't have
so many kids to do it to.
I got a blessing from the state president. He
said it's all right to get mad at him.

Sept 13a

Shogol has been fun lately and my
teacher said I'm doing good.

Jane Doe 5 - -

We want to the state fair. I was fun. The
a great & a great & I got a beautiful little glass
blown unicorn. She's perched with a pink
mane & tail.
I'm doing great at Dr. Whitehead! I +
I'm doing great at Dr. Whitehead! I +